

Daniel Fellner v. Travel 4 All Seasons, LLC
United States District Court - District of Arizona No. 2:19-cv-01719-DJH
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| 1. | Declaration of Alfred Hague |
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EXHIBIT 1

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Daniel Fellner,

Plaintiff,

v.

Travel 4 All Seasons, LLC,

Defendant.

No. 2:19-cv-01719-DJH

**DECLARATION OF ALFRED
HAGUE IN SUPPORT OF
DEFENDANT'S REPLY IN
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT**

I, Alfred Hague, declare as follows:

1. I am a disabled U.S. military veteran over 18 years of age, I am of sound mind to make this Affidavit, and I have personal knowledge of the allegations made by Plaintiff Daniel Fellner ("Fellner") in this action. I also have personal knowledge of Defendant Travel 4 All Seasons, LLC ("Travel 4") because I am the only Member of that company.

2. Travel 4 re-posted Fellner's article (the "Article") on its website located at: www.travel4allseasons.com (the "Website"). When Travel 4 re-posted the Article, the Website had three advertisements on the right-hand side of the webpage.

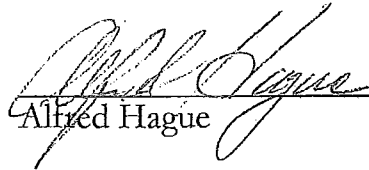
3. The first advertisement was for Al Hague Photography, a company I own. Travel 4 made no revenue from this advertisement.

4. Travel 4 posted the second advertisement for "Old Tahoe Premium Honey Rye & Straight Rye Whiskey" for one of my friends. Old Tahoe has gone out of business and Travel 4 made no revenue from this advertisement.

5. The third advertisement was for Viking Cruises, and Travel 4 posted it because I like that cruise line. Viking Cruises did not pay Travel 4 to post the advertisement and Travel 4 made no revenue from this advertisement.

1 6. I make this Declaration pursuant to Fed. R. Civ. P. 56(c)(4) and I declare
2 under the penalty of perjury that the foregoing is true and correct.

3 Dated this 10th day of December 2019.

4
5 
6 Alfred Hague